

### REMARKS

This Amendment is in response to the Office Action dated October 31, 2006. In the Office Action, claims 1-29 and 31-40 were rejected. With this Amendment, claims 1-6, 10-13, 15-27, 31-33 and 36-40 are amended to clarify that which is being claimed. It is respectfully submitted that, claims 1-29 and 31-40 are in condition for allowance.

#### **I. Interview Summary**

Applicant's attorney would like to thank the Examiner for the courtesies extended during a telephone interview on January 10, 2007. During this interview, Applicant's attorney and the Examiner discussed the Bjorstrom et al. reference (US 6,594,348) and the Chiu et al. reference (US 2002/0107888) in light of the independent claims. An agreement was made to the point that the discussed references fail to teach or suggest simultaneous interaction of a plurality of input devices with a shared display. Therefore, it is respectfully believed that the amendments made to clarify claim language in claims 11-6, 10-13, 15-27, 31-33 and 36-40 puts the present application in condition for allowance.

#### **II. § 112, Second Paragraph Rejections**

Claims 3, 10, 12, 18, 20, 25, 26, 36 and 39 were rejected under 35 U.S.C. §112, 2<sup>nd</sup> paragraph, because "there is insufficient antecedent basis" for the limitation "the portable input devices." Claims 3, 10, 12, 18, 20, 25, 26, 36 and 39 are amended. It is respectfully submitted that this rejection be withdrawn.

Claim 21 was rejected under 35 U.S.C. §112, 2<sup>nd</sup> paragraph, because "there is insufficient antecedent basis" for the limitation "the alternative link activation tag." Claim 21 has been amended to recite "the alternative component activation tags." It is respectfully submitted that this rejection be withdrawn.

Claim 27 was rejected under 35 U.S.C. §112, 2<sup>nd</sup> paragraph, because "there is insufficient antecedent basis" for the limitation "the plurality of input devices." Claim 27 has been amended to recite "the different portable input devices" that is recited in independent claim 22 of which claim

27 is dependent. It is respectfully submitted that this rejection be withdrawn.

Claim 36 was rejected under 35 U.S.C. §112, 2<sup>nd</sup> paragraph, because “there is insufficient antecedent basis” for the limitation “each portable input device.” Claim 36 has been amended to recite “the different portable input devices.” It is respectfully submitted that this rejection be withdrawn.

### **III. § 103(a) Rejections**

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all of the claim limitations. *In re Vaeck*, 20 U.S.P.Q.2d 1438 (Fed. Cir. 1991); M.P.E.P. §2143.

The initial burden is on the examiner to provide some suggestion of the desirability of doing what the inventor has done. “To support the conclusion that the claimed invention is directed to obvious subject matter, either the references must expressly or impliedly suggest the claimed invention or the examiner must present a convincing line of reasoning as to why the artisan would have found the claimed invention to have been obvious in light of the teachings of the references.” *Ex parte Clapp*, 227 USPQ 972, 973 (Bd. Pat. App. & Inter. 1985).

#### **A. Claims 1-6, 14-16, 20-25, 27-28, 31, 33-34 and 37-39**

Claims 1-6, 14-16, 20-25, 27-28, 31, 33-34 and 37-39 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Bjurstrom et al. (US 6,594,348) in view of Chiu et al. (US 2002/0107888). It is respectfully submitted that the combination of cited references fail to teach or suggest all of the claim elements in independent claims 1, 15, 22, 33 and 38.

On pages five and six of the Office Action, the Examiner states that Bjurstrom et al. fails to disclose “controlling a shared display module to display the alternate component activation tag with the convert component in the hypertext document” and “activating the converted component

in the hypertext document displayed on the display module by receiving an input signal related to the alternate component activation tag from at least one of a plurality of portable input devices operated by one of the plurality of users that are viewing the display module.” The Examiner, however, points to Chiu et al. as disclosing “a system for browsing online using numeric keys wherein a displayed document containing plurality of hyperlinks is edited to include[ing] a correspond number to the plurality of hyperlinks, wherein the updated document is displayed with the corresponding number next to its corresponding hyperlink.” In addition, the Examiner points to Chiu et al. as including a television where “two or more users may view the television at the same time wherein one of the users at a time operates the television using a remote.”

In regards to independent claim 1, even if one were to combine the cited references, the combination of references fail to teach or suggest that “the shared display module is simultaneously viewable by a plurality of users of which each user is simultaneously interacting with a different portable input device” and “activating the converted components in a hypertext document on the shared display module by receiving input signals related to the alternate component activation tags from the different portable input devices.” Bjurstrom et al. discloses associating elements of a HTML page to DMTF tones and implementing a function on a HTML page in response to receiving DMTF tones from a telephone (see col. 5, line 54 to col. 9, line 67). Chiu et al. discloses displaying symbols next to hyperlinks so that a user can operate the hyperlink by using a numeric key. None of the references disclose the activation of converted components in the hypertext document displayed on the shared display module (which is viewable by a plurality of users of which each user is simultaneously interacting with a different portable input device) based on the receipt of input signals related to the converted components from the different portable input devices.

The Examiner in the Response to Arguments section of the Office Action states that “controlling a shared display module to display the alternative component activation tag with the converted component in the hypertext document wherein the shared display module is simultaneously viewable by a plurality of users” is viewed in Chiu et al. Although a plurality of users can view a television and a remote control can control items on the television screen, such a

display does not allow for the activation of components or alternate component activation tags on the display by different portable input devices of which each user viewing the display is simultaneously interacting with as is claimed in claim 1. It is respectfully submitted that claim 1 is allowable over the cited references as well as claims 2-6 and 14 that depend therefrom.

In regards to independent claim 15, even if one were to combine the cited references, none of the references disclose the activation of a browsing mode in the hypertext document displayed on the shared display module (which is viewable by a plurality of users of which each user is simultaneously interacting with a different portable input device) based on the receipt of input signals related to alternate browsing activation tags from the different portable input devices. In addition, as discussed above, although a television (as disclosed in Chiu et al.) can be viewed by two or more people, such a display does not allow for the activation of browsing modes by different portable input devices of which each of a plurality of user is simultaneously interacting with as is claimed in claim 15. It is respectfully submitted that claim 15 is allowable over the cited references as well as claims 16, 20 and 21 that depend therefrom.

In regards to independent claim 22 and similar to the discussion in regards to claim 1, even if one were to combine the cited references, none of the references disclose an input processor that receives and processes input signals related to alternate component activation tags displayed on the shared display module (which is viewable by a plurality of users of which each user is simultaneously interacting with a different portable input device) from the different portable input devices. In addition, as discussed above, although a television (as disclosed in Chiu et al.) can be viewed by two or more people, such a display does not allow for the receipt and processing of input signals related to converted components displayed to a plurality of users of which each user is simultaneously interacting with a different portable input device as is claimed in claim 22. It is respectfully submitted that claim 22 is allowable over the cited references as well as claims 23-25, 27-28 and 31 that depend therefrom.

In regards to independent claim 33 and similar to the discussion in regards to claim 15, even if one were to combine the cited references, none of the references disclose an input processor that receives and processes input signals related to an alternate browsing activation tag

displayed on the shared display module (which is viewable by a plurality of users of which each user is simultaneously interacting with a different portable input device) from the different portable input devices. In addition, as discussed above, although a television (as disclosed in Chiu et al.) can be viewed by two or more people, such a display does not allow for the receipt and processing of input signals related to converted browsing modes displayed to a plurality of users of which each user is simultaneously interacting with a different portable input devices as is claimed in claim 33. It is respectfully submitted that claim 33 is allowable over the cited references as well as claims 34 and 37 that depend therefrom.

In regards to independent claim 38 and similar to the discussion in regards to claim 1, even if one were to combine the cited references, none of the references disclose the activation of a converted component in the hypertext document displayed on the shared display module (which is viewable by a plurality of users of which each user is simultaneously interacting with the different portable input devices) based on the receipt of an input signal related to the converted component from the different portable input devices. In addition, as discussed above, although a television (as disclosed in Chiu et al.) can be viewed by two or more people, such a display does not allow for the activation of converted components displayed to a plurality of users by a the different input devices as is claimed in claim 38. It is respectfully submitted that claim 38 is allowable over the cited references as well as claim 39 that depends therefrom.

#### **B. Claims 7 and 9**

Claims 7 and 9 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Bjurstrom et al. in view of Chiu et al. and further in view of Lai et al. (US 6,912,326). It is respectfully submitted that claims 7 and 9 are in condition for allowance at least based on their dependency on allowable claim 1.

#### **C. Claim 8**

Claim 8 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Bjurstrom et al. in view of Chiu et al., further in view of Lai et al. and further in view of Sotomayor (US

5,708,825). It is respectfully submitted that claim 8 is in condition for allowance at least based on its dependency on allowable claim 1.

**D. Claims 10-13, 17-19, 29, 35-36 and 40**

Claims 10-13, 17-19, 29, 35-36 and 40 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Bjurstrom et al. in view of Chiu et al. and further in view of Borman et al. (US 6,226,955). It is respectfully submitted that claims 10-13, 17-19, 29, 35-36 and 40 are in condition for allowance at least based on their dependency on allowable claims 1, 15, 22 and 33.

However, these dependent claims are allowable for additional reasons. For example, the cited references fail to teach or suggest “controlling the shared display module to display the automated browsing modes and automated browsing activation tags to the plurality of users” as claimed in claim 10 and 40 and “controlling the shared display module to display the automated browsing modes and automated browsing activation tags to the plurality of users” as claimed in claim 17.

**E. Claim 26**

Claim 26 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Bjurstrom et al. in view of Chiu et al. and further in view of Tanenbaum. It is respectfully submitted that claim 26 is in condition for allowance at least based on its dependency on allowable claim 22.

However, dependent claim 26 is allowable for additional reasons. For example, the cited references fail to teach or suggest that “the input processor is further configured to process different types of input signals received from the different portable input devices in an order” as claimed in claim 26.

**F. Claim 32**

Claim 32 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Bjurstrom et al. in view of Buckley et al. and further in view of Giacalone, Jr. (US 2001/0052000). It is respectfully submitted that claim 32 is in condition for allowance at least based on its

dependency on allowable claim 22.

For the reasons stated above, it is respectfully submitted that all pending claims 1-29 and 31-40 are in condition for allowance. Favorable action is respectfully requested.

The Director is authorized to charge any fee deficiency required by this paper or credit any overpayment to Deposit Account No. 23-1123.

Respectfully submitted,

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